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 8
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 9
                  FOR THE CENTRAL DISTRICT OF CALIFORNIA
10
    UNITED STATES OF AMERICA,
                                 ) No. CR 09-1004-MMM
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                 Plaintiff,
                                  GOVERNMENT'S SENTENCING POSITION
12
                                  REGARDING THE SENTENCING OF
                                  DEFENDANT PAUL CHALLENDER
                 v.
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    PAUL CHALLENDER,
                                  Sentencing date:
                                                        3/21/11
14
                                  Time:
                                                        1:15 p.m.
                 Defendant.
15
                                   [Courtroom of the Honorable
                                  Margaret M. Morrow]
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INTRODUCTION

I.

Defendant Paul Challender ("Challender") was an active member of the Quest4More bulletin board, an Internet bulletin board explicitly designed for the widespread trading of extremely graphic and disturbing images of child pornography among a group of individuals who continually promoted and celebrated the sexual torture of young children. Indeed, defendant Challender not only made over 280 posts to the Quest4More bulletin board; he also recruited at least one other individual to join the board in an apparent attempt to expand the pool of individuals who could post child pornography to the board.¹

As discussed in detail below, the seriousness of the conduct engaged in by the Quest4More members in general; the seriousness of defendant Challender's own conduct as reflected in the number and substance of the posts that he made to the Quest4More board; and defendant Challender's troubling sexual obsession with infants and toddlers are all factors that bring this case outside of the realm of the typical child pornography case and favor punishment above and beyond the punishment typically imposed in such cases.

The Probation Office has opined that defendant Challender's conduct in this case was so egregious that he should receive the statutory maximum penalty for his offense -- a sentence of 240 months. While such a sentence could easily be defended following

As explained below, this individuals was an undercover agent who discovered the Quest4More bulletin board after being invited to become a member of the board by defendant Challender.

the application of the factors set forth at 18 U.S.C. § 3553(a) to this case, the government believes that a sentence of 151 months, to be followed by a lifetime period of supervised release, is a sufficient sentence in this case and one that balances the aggravating facts cited below with whatever mitigating evidence defendant Challender can cite, as well as the fact that defendant Challender did accept responsibility for his horrific conduct in this case in a timely manner. Accordingly, for the reasons set forth in full below, the government recommends that defendant Challender be sentenced to 151 months imprisonment to be followed by a lifetime of supervised release.

II.

PERTINENT FACTS

A. THE DISCOVERY OF THE QUEST4MORE BOARD

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In May 2008, ICE Special Agent ("SA") James Kilpatrick, from ICE's Pittsburg, Pennsylvania office, took over the online identity of a cooperating child exploitation defendant. He went online as this person and ended up chatting with someone using the screen name "Hilljoe," later identified as defendant Paul Challender. "Hilljoe" provided SA Kilpatrick with a link to the Quest4More message board, a username, and a password to gain access to the board. SA Kilpatrick logged into Quest4More using the username and password provided by "Hilljoe," and he discovered that it was an electronic bulletin board devoted to topics reflecting a sexual interest in children and child pornography.

Quest4More is registered to a free message board site that is hosted on servers located in Los Angeles by a message board

hosting site called IBPFree.com. IBPFree.com allows Internet users to set up free message boards using its site, and it is hosted by WebNX, a commercial Internet hosting company located in Los Angeles, California. That means that any message or image posted onto the board travels through servers in Los Angeles, then out again to any member looking at the board. ICE in Pittsburg used the username and password given to SA Kilpatrick by defendant Challender to review the board. In addition, two federal search warrants were conducted on the board, which allowed ICE to seize and analyze the board's contents.

From reviewing the board, the government learned that its exclusive purpose was to allow its members to trade child pornography, focusing on extremely young children, especially children being violently molested. In addition, the review of the board disclosed the following things, among others, about the Quest4More message board:

- * Quest4More had approximately 30 members. There was a vetting process for allowing new members to join Quest4More.

 Members were screened to ensure that they did not pose a risk to Quest4More and those utilizing the message board.
- * Quest4More members did not use their real names, but instead used screen names to mask their identities. The Quest4More message board had a function that allowed members to create a "signature" that automatically appeared at the end of every one of that member's posts. This "signature" contained text and/or images.
- * Members of Quest4More were encouraged and required to post images and videos directly into fora categorized by type:

"Hard Core" images were to be posted in the "H/C pics" forum;
"Soft Core" images were to be posted in the "S/C pics" forum;
child pornography videos were to be posted in the "Videos" forum;
non-nude videos of children were to be posted in the "NN Videos"
forum; images of children who have been ejaculated upon were to
be posted in the "cummed on pics" forum; and child pornography
images depicting infants and toddlers were to be posted in the
"Nepi" forum, named after the Greek word for "infant." In
addition, the H/C pics forum contained a sub-forum titled "more
to jack off to."

- * Within the fora, Quest4More members could (and did) post child pornography images and videos. They could also (and did also) post erotic stories about men having sex with young children.
- * Once a Quest4More member made a post, any other member could post comments on the post. For instance, a member could post a picture of child pornography, and other members who viewed it could enter posts discussing how much they liked the picture or could request that similar pictures be posted.
- * Quest4More members communicated with one another extensively about their private collections of child pornography images, as well as their ongoing contact with children in the United States and abroad.
- * While members could post whatever types of child pornography they wished, many appeared to prefer child pornography depicting very young, pre-pubescent children. For example, a poll posted on Quest4More asked, "If there were a line of little girls in front of you, all ready to suck you, which one

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would you pick first?" The possible answers ranged from one through ten years old. The winning category, with approximately 30% of the vote, was nine years old. The category that placed second in the poll, at approximately 15% of the vote, was three years old. Another poll on Quest4More asked, "When wanking off to pics of cummed on girls what age makes you cum the hardest?" Answers included, "I prefer slightly older so I voted 8+;" "4-10;" and "3-5 is my favorite too but any PT [pre-teen] is fine."

Many Quest4More members also appeared to prefer child pornography depicting children in pain. In this regard, Quest4More members frequently used the message board to discuss their fantasies about violently raping children. For example, a poll on Quest4More asked, "What do you do with a 7yo whore in your bed?" Possible answers included the following: (1) "Regular mouthfucking and fucking her pussy;" (2) "Slap her face, spit in her face, really treats her like trash;" (3) "Bend her over and assfuck her hard for two hours;" and (4) "Tie her up and abuse her." Answers posted by Quest4More members included the (i) "I clicked 3 then I think 1 then I'd lick her head to toe or toe to head rubbing my cock all over her sliden my cock in every hole!"2 (ii) "I'm glad that fourth option was included, as that reflect my choice . . . " The post included a picture of a nude pre-pubescent girl, bound to a bed. Her arms and thighs are tied by rope, with her legs open, exposing her genitals. Her mouth is gagged. (iii) "I voted to ass fuck her hard for 2 hours, but I would also fuck her pussy and make her

Each post from the Quest4More bulletin board that is quoted in this pleading is quoted verbatim.

suck my cock too. I would also tie her up if needed. Come to think of it, I would probably slapped her some too. So my real vote is ALL OF THE ABOVE! But damn, only 1 hour with the little slut? I need much more time, like weeks, months would be better . . . lol [laugh out loud]."

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Another poll asked Quest4More members whether they had considered abducting a preteen girl/boy. Possible answers included the following: (1) "I've thought about it, and would absolutely do it;" (2) "I've thought about it, if circumstances were right, I'd do it;" (3) "I've thought about it, but most likely would not do it;" (4) "I haven't thought about it much, not sure if I would or not; " and (5) "I haven't thought about it and would not do it." Responses posted by Quest4More members included the following: (i) "I was just curious if anyone has thougt much about just going out and snatching a little girl. so, how old would she be, any particular type of girl, how long would you keep her? Would you be gentle and loving, or just fuck her hard and not care about her, or would it be somewhere in between those two options." (ii) "If I did it, it would be on the big scale, id go to a sleep over camp, and pick up the 7-8 year olds, and fuck them all, tie them up, and rape them for hours. I know, me so bad, and a sick puppie. Thanks for the great post everyone." (iii) "don't get me wrong I luv to wack to sweet yng girls and would kiss lick suk fuk shhot my load on anyone of em, but I coiudnt force it." (iv) "I voted I would do it if the place was right . . . she would be about 5 or 6 so I could have her for many years to come and time to teach her good, so I could make really good role play movies with her. would

love it if she were asian, but would settle for anything just the age is right. For sex- I would fuck her shit hard all the time. just like Tara gets abused, im kind of the same as 'daddy.'" (v) "I had to go with the third option, although perhaps another option that could be provided would be 'I would if I knew I could get away with it.' And my girl would be three years old and I definitely would NOT be gentle and loving...:o) as a frame of reference, this would be the kind I'd grab." The post included a picture of a female toddler, naked on a bed. (vi) Defendant Ho posted "YES I WOULD." The post contained a picture of a clothed, smiling toddler girl.

- * Quest4More members were required to follow security rules regarding remaining anonymous. For instance, it was suggested that the members follow protocols that mask their IP address and location. The stated purpose for these rules was to ensure that law enforcement did not discover Quest4More or uncover its member's activities.
- * Quest4More members discussed security measures designed to cloak their illegal activities in secrecy, such as removing a member or suspending his account if they believed the member posed a risk of the Board being discovered. They also shared information about law enforcement's efforts to identify individuals trading in child pornography, and they discussed how to avoid the detection of their illegal activities by law enforcement.
- B. THE IDENTIFICATION OF DEFENDANT CHALLENDER AS A MEMBER OF THE QUEST4MORE INTERNET BULLETIN BOARD

An examination of the Quest4More message board confirmed

that "Hilljoe" -- who was subsequently identified as defendant Challender -- joined the Quest4More message board on or about June 18, 2007. After joining the message board, "Hilljoe" made over 280 posts to other Quest4More message board users on the Quest4More board. (See Exhibit A (a profile of defendant Challender's use of the Quest4More bulletin board seized from the board)).

The IP addresses used by Hilljoe to post to Quest4More on July 3, 2008, and February 11, 2009, came back to the Internet account of Paul Challender at his home in Big Rapids, Michigan.

On September 22, 2009, a federal search warrant was conducted at defendant Challender's home. Defendant Challender agreed to be interviewed, and he confessed that he was "Hilljoe" during the interview. (PSR \P 19). Defendant Challender also confessed that he had collected child pornography for the previous eight years and said that he was a pedophile who was sexually interested in baby boys. (<u>Id.</u>)

A search of a computer that defendant Challender possessed at his residence yielded several hundred images and several hundred movies featuring child pornography. (PSR ¶ 16). These images primarily depicted infants, toddlers, and preteens and included images depicting sadomasochistic behavior with these child victims. (Id.) Agents also found children's clothing and diapers in the residence, but no children residing there. (PSR ¶ 19). When questioned about this find, defendant Challender said he used the clothing and diapers for sexual gratification.

(Id.).³

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C. DEFENDANT CHALLENDER'S ACTIVITY ON THE QUEST4MORE BOARD

Defendant Challender joined the Quest4More board on June 18,

2007. (See Exhibit A). After joining this message board,

defendant Challender entered at least 289 total posts to the

message board, approximately 10.55% of all of the posts entered

on this message board. (Id.). This made defendant Challender

one of the most frequent posters on the board.

As defendant Challender admitted as part of his plea

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On October 27, 2009, defendant Challender proffered information regarding his participation in online bulletin boards and forums discussing the rape and victimization of children. Challender provided information regarding members of the Quest4more bulletin board, however, this information was both known to law enforcement through the pending investigation and/or was not specific enough to assist law enforcement in the identification and apprehension of other involved members. Defendant Challender also revealed that during the course of chatting with individuals interested in trafficking child pornography, an individual from Manitoba, Canada requested Challender's assistance in kidnapping and raping a child. According to defendant Challender, this individual was planning on acting on this plan but requested assistance in order to avoid apprehension from law enforcement. Agents from the ICE office in Michigan attempted to utilize this information to identify the Canadian requesting this assistance from defendant Challender. However, the information gathered from defendant Challender's proffer was not specific enough to identify any location, IP address, or user name that could assist in locating this individual for further chat or identification. The government, aware of this attempt at cooperation provided by defendant Challender at the time it made its plea offer in this case, factored in defendant Challender's attempt to cooperate in that plea offer by capping its sentencing recommendation. government believes that defendant Challender's attempt to cooperate with the government did not rise to the level of "substantial assistance" in the prosecution or investigation of another and that defendant Challender's attempt to cooperate is adequately reflected in the recommendation made by the government herein.

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agreement with the government, and as confirmed through a review of the Quest4More bulletin board, defendant Challender posted child pornography images and videos on the Quest4More message board and, in return, he received and possessed child pornography images and videos that were posted by other members of the board. (PSR \P 15). By means of example only, on or about August 19, 2008, Quest4More member, defendant William Ho, utilizing the screen name "Mayan2012," posted a message on the Quest4More bulletin board titled "Here's some yummy ones!" Under this title, defendant Ho posted images of toddlers and prepubescent girls bound and gagged; an image of a toddler, with her legs spread, who was pictured with a man inserting his finger into her naked vagina; and an image of an infant with an adult male penis near her face and semen near her mouth. Two days later, defendant Challender, confirming that he had received and possessed these images of child pornography posted by defendant Ho, posted a message in response to this posting stating, "Great, never too young to be raped." (PSR \P 14). In addition, defendant Challender frequently posted about a number of other disturbing topics, including (1) his strong interest in "nepi" (child pornography images featuring infants and toddlers); (2) fantasies he has had about raping toddlers; and (3) the enjoyment he derives from watching children in pain as a result of being sexually tortured. (Attached hereto at Exhibit B is a sample of some of these posts authored by defendant Challender).4

In addition to the foregoing, defendant Challender was obviously involved in recruiting others to join the Quest4More bulletin board, as his recruitment of the undercover agent in

III.

THE SENTENCING GUIDELINE CALCULATIONS

The government has not identified any factual objections or corrections to the PSR. The government submits that the proper application of the Sentencing Guidelines in this case is as follows:

7	Base Offense Level	:	22	[U.S.S.G.
8	<u>Adjustments</u>			§ 2G2.2(a)(2)]
9	Offense involved			
10	material that depicted minors under the age of		. 0	
11	12	•	<u>+2</u>	[U.S.S.G. § 2G2.2(b)(2)]
12	Offense involved the distribution of child			
13	pornography with the expectation that child			
14	pornography would be received in return	•	+5	[U.S.S.G.
15	leceived in lectri	•	<u> +5</u>	§ 2G2.2(b)(3)(B)]
16	Offense involved material that portrays			
17	sadistic or masochistic conduct	:	+4	[U.S.S.G.
18	·	•		§ 2G2.2(b)(4)]
19	Offense involved the use of a computer	:	+2	[U.S.S.G.
20		•		§ 2G2.2(b)(6)]
21	Offense involved 600 or more images	:	+5	[U.S.S.G.
22	or more rinages	•		§ 2G2.2(b)(7)]
23	Acceptance of Responsibility	:	-3	[U.S.S.G.
24	· · · · · · · · · · · · · · · · · · ·	-	,	§ 3E1.1]
25	Total Adjusted Offense Level		37	
26	_	-		

this case led to the discovery of the board.

At criminal history category I, and offense level 37, the government submits that defendant Challender's guideline range, as calculated pursuant to the Sentencing Guidelines, is 210 to 262 months imprisonment.⁵

IV.

ARGUMENT

A SENTENCE OF 151 MONTHS IS APPROPRIATE IN THIS CASE UPON CONSIDERATION OF THE FACTORS CITED UNDER 18 U.S.C. § 3553(a)

Pursuant to the Supreme Court's directive in <u>United States v. Booker</u>, 543 U.S. 220 (2005), this Court is required to consider all of the factors under 18 U.S.C. § 3553(a) to determine an appropriate sentence in this case. Thus, in addition to considering the sentence yielded by an application of the advisory Sentencing Guidelines to this case, this Court must also consider, among other things, whether a particular sentence it is prepared to impose (1) reflects the seriousness of defendant's offense, promotes respect for the law, and provides just punishment for defendant's offense; (2) satisfies the goals of specifically and generally deterring the criminal conduct defendant committed in the instant case; and (3) is needed to

The Probation Office has taken the position that defendant Challender should be subject to a vulnerable victim enhancement as well, in light of the Ninth Circuit's decision in <u>United States v. Wright</u>, 373 F.3d 935 (9th Cir. 2004). The government does not disagree with the Probation Office's assessment that this enhancement should apply in this case. However, in light of the Court's decision not to apply this enhancement in defendant Pharis' case, the government believes that it would be unfair to apply it in defendant Challender's case, as the rationale for applying that enhancement would be the same in the case of both of these defendants.

protect the public. Taking these factors into consideration, the government believes that a sentence of 151 months is a sentence at the lowest range of what should be deemed appropriate punishment for defendant Challender's distrubing conduct in this case.

1. The Nature and Seriousness of Defendant's Offense

Insofar as the seriousness of defendant Challender's offense is concerned, it should not be a matter of much debate that criminal offenses involving the sexual exploitation of children, such as the instant offense, are serious violations of the law. As the Supreme Court has recognized, the prevention of sexual exploitation and abuse of children is an "objective of surpassing importance." New York v. Ferber, 458 U.S. 747, 756 (1982).

Further, "[t]he legislative judgment as well as the judgment found in the relevant literature, is that the use of children as subjects of pornographic materials is harmful to the physiological, emotional, and mental health of the child." Id., 458 U.S. at 758. This harm is caused not only by the abusive acts perpetrated during the production of child pornography, but also the enduring record of the child's sexual abuse. As the Supreme Court has recognized:

[T]he materials produced by child pornographers permanently record the victim's abuse. The pornography's continued existence causes the child victims continuing harm by haunting the children in the years to come. The . . . ban on possession and viewing encourages the possessors of these materials to destroy them. Second, encouraging the destruction of these materials is also desirable because evidence suggests that pedophiles use child pornography to seduce other children into sexual activity.

Osborne v. Ohio, 495 U.S. 103, 111 (1990) (citations omitted). A

sexually abused child who has been photographed must go through life knowing that these images are circulating within the mass distribution system for child pornography. Ferber, 458 U.S. at 758 n.9 & 760 n.10 (discussing harms to children caused by child pornography, including violation of their privacy interests). Consequently, the Supreme Court has found that child pornography is not protected by the First Amendment, and the Court has upheld laws prohibiting the distribution of this material, and the possession of this material. See Osborne, 495 U.S. at 111; Ferber, 458 U.S. at 763.

The Ninth Circuit has also recognized the seriousness of offenses like the offense committed by defendant here by recognizing that the victims of child pornography are the sexually exploited children depicted in the images. <u>United States v. Boos</u>, 127 F.3d 1207 (9th Cir. 1997). In rejecting the defendant's argument that the only victim of his child pornography trading was society in general, the court found that the primary victims of defendant's criminal conduct were the children depicted in the images:

After all it was the children depicted -- and not society at large -- who were acted on and adversely affected, who oftentimes were forced to participate in the production of the pornography in which Boos traded, who were injured (both physically and psychologically) as a result of Boos's patronage of the porn industry, who were sacrificed to satisfy Boos's curiosities, who were subjected to the cruelest form of oppression, hardship, and mistreatment at the hands of pornography producers and photographers, and whose lives were quite possibly destroyed in the process.

Id. at 1210. In addition, the court found that the legislative history of 18 U.S.C. § 2252 indicated that Congress sought to protect the children involved in the production of child

pornography by prohibiting the distribution and possession of child pornography. <u>Id.</u> at 1211. This legislative history was recently summarized by the Ninth Circuit in a case upholding the criminalization of child pornography possession:

(1) Congress determined that child pornography is a multi-million dollar industry in which sexually explicit depictions of children are bought, sold, and traded interstate; (2) Congress decided to "stamp out" the market for child pornography by criminalizing the production, distribution, receipt, and possession of child pornography; and (3) Congress thought it could strike a blow to the industry by proscribing possession of child pornography "because those who possess and view child pornography encourage its continual production and distribution." 136 Cong. Rec. at S4730.

<u>United States v. Adams</u>, 343 F.3d 1024, 1032 (9th Cir. 2003) (emphasis in original).

Here, there are several obvious aspects to this case which make defendant Challender's conduct more serious than the conduct

The district judge was influenced by the erroneous belief that a sentence affects only the life of the criminal and not the lives of his victims. Young children were raped in order to enable the production of the pornography that the defendant downloaded and uploaded - both consumed himself and disseminated to others. The greater the customer demand for child pornography, the more that will be produced.

<u>Id.</u> at 672.

In <u>United States v. Goldberg</u>, 491 F.3d 668 (7th Cir. 2007), the Seventh Circuit also recently emphasized the seriousness of defendant's crime of conviction, reversing a district court's decision to sentence a defendant to one day imprisonment in a child pornography case where the low end of his advisory guideline range for his offense was 63 months. In so ruling, the court, consistent with the decisions of the Ninth Circuit cited above, stressed the seriousness of the criminal conduct at issue in this case, and the need to severely punish that conduct, by describing the harm the possession of child pornography brings to child victims. As the court explained:

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at issue in the mine-run, single-defendant child pornography case, and which counsel in favor of imposing a significant sentence in this case. For instance, defendant Challender not only possessed, received, and distributed child pornography, but did so in the context of an organization of "like-minded" individuals who advocated the sexual torture of children. Moreover, the images that were disseminated and literally enjoyed by members of the Quest4More board, including defendant Challender, were extremely troubling images involving the sadistic abuse of extremely young children, including infants and toddlers. Finally, the seriousness of defendant Challender's offense is reflected by the incredible harm that his actions, and those of the other members of Quest4More who he spurred on, has visited on the children captured on the images that defendant Challender and his co-conspirators watched for their pleasure. As indicated in the page from the "child identification report" attached hereto at Exhibit C, the National Center for Missing and Exploited Children has examined the Quest4More bulletin board that defendant Challender contributed to as a member no less than 289 times and identified 46 different "series" of child pornography involving different child victims who have been identified by law enforcement. Attached at Exhibit D are victim impact letters written by these victims or their parents which describe the horrors these young victims endured as a result of the documentation of their sexual abuse and the trauma these children continue to experience today as a result of their knowledge that people like defendant Challender and his coconspirators are continuing to receive sexual gratification at

the expense of the harm they endured.

There are also aspects of defendant Challender's participation in the offense at issue in this case which should be viewed as aggravating, including the fact that (1) as an individual who posted to the Quest4More board at least 289 times, he was an active members of the board; (2) as evidenced by the fact that defendant Challender recruited the undercover agent in this case to join Quest4More, defendant Challender was an individual who brought others to Quest4More in an attempt to expand the sources of child pornography that the board could draw from; (3) defendant Challender's comments on the board, particularly insofar as they focused on his sexual interest in infants and toddlers, were among the most graphic, lewd, and vile that were posted on the board; and (4) defendant Challender possessed thousands of images of child pornography at his home above and beyond those contained on the Quest4More board.

In sum, there is little that someone examining the conduct at issue in this case could view as anything other than aggravating behavior that calls for serious punishment, and this case sits outside of the realm of the "typical" child pornography case in both scope and seriousness. Accordingly, the nature of this case, and the seriousness of defendant Challender's offense justifies a sentence of at least 151 months imprisonment.

2. The Defendant's Background and the Risk of Recidivism
While defendant Challender has no prior criminal history, it
is clear that he has engaged in the illegal possession,
distribution, and receipt of child pornography for a significant
amount of time. Indeed, defendant Challender admitted to ICE

agents when he was interviewed on September 22, 2009 that he had been viewing child pornography for eight years prior to his arrest in this case.

It is also clear that defendant Challender poses a danger to children. He is unquestionably a pedophile who, most troubling, is sexually obsessed with the most helpless of children, namely, infants and toddlers. Moreover, given the deep-seated sexual interest that defendant Challender has had with children, and his long-standing attraction to the most vile forms of child pornography imaginable, it is fair to believe that the risk of recidivism defendant Challender poses is rather high.

Accordingly, a lengthy term of imprisonment is justified not only to account for the seriousness of defendant Challender's offense, but also to account for the danger to the community that defendant Challender poses in light of the sexual obsession that he has with children and his unchecked desire to view images of the sexual torture of extremely young children.

3. <u>The Advisory Sentencing Guidelines</u>

While the Sentencing Guidelines are, of course, advisory in this case, they recommend a sentence that greatly exceeds the sentence recommended by the government here. Indeed, as explained above, the 151 month sentence recommended by the government here represents a generous departure from the 210 month sentence that the Sentencing Guidelines recommend in this case (and from the 240 month sentence recommended by the Probation Office). Accordingly, the 151 month sentence recommended by the government is an extremely generous sentencing recommendation when compared to the sentence that the Sentencing

Guidelines would seek to compel, as well as the sentence recommended by the Probation Office.

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CONCLUSION

For each of the foregoing reasons, the government recommends that defendant Challender be sentenced to 151 months imprisonment to be followed by a lifetime period of supervised release subject to each of the conditions recommended by the Probation Office.

DATED: February 28, 2011

Respectfully submitted,

ROBERT E. DUGDALE

Assistant United States Attorney Chief, Criminal Division

Attorneys for Plaintiff UNITED STATES OF AMERICA

While the government greatly respects the incredible effort that the Probation Office put into making its thoughtful recommendation in this case and the fact the Probation Office's recommendation fully appreciates the seriousness of defendant Challender's conduct, the government believes that defendant. Challender is entitled to some consideration for his prompt acceptance of responsibility in this case and the effort that he made to cooperate with the government following his arrest. Moreover, the government believes that the imposition of a lifetime period of supervised release would somewhat temper the need for the sentence advocated by the Probation Office. Accordingly, while one could easily view the horrendous conduct in this case and draw the conclusion that it justifies the maximum sentence provided by law (as the Probation Office apparently did here), the government believes a sentence of 151 months is an appropriate sentence.



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hilljoe

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Member Group: Admin

Find all posts by this member · Add to contact list · Edit my Signature · Avatar Options · Edit my Profile

	Active Stats	Communicate		
User's local	tal mulative Apr 29 2009, 02:37 PM tal 289 (10 55% of total forum posts)	AIM Name	No Information	
time		ICQ Number	No Information	
Total Cumulative		Yahoo Identity	No Information	
Posts		MSN Identity	No Information	
Posts per day	0.4	Integrity Messenger Personal Message	No Information	
Joined	18-June 07		Click Here	
•		Email	<u>Click Here</u>	
•	Information	Po	osting Details	
Home Page	No Information	Avatar		
Birthday	No Information	Signature		
Location	No Information		•	
Interests	No Information			
3	Lo-Fi Version Script Exec Powered by IP.Board v1.3 © 2003 -	Your last action	2 queries used GZIP Enabled on was on: Apr 29 2009, 02:37 PM Report Abuse	



http://localhost/ipbfree_test/index.php?s=2b817066199051d8a65b54512...



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quest4more -> All posts by a member

Pages: (6) « First ... 4 5 [6]

Poll: Favorite Preteen Fucktoy?

hilljoe

Posted on: Sep 12 2007, 11:30 PM

Replies: 23

love to see them all got me homey with no place to go

Views: 116

Forum: Discussions · Post Preview: #3483

Poll: Favorite Preteen Fucktoy?

hillioe Posted on: S

Posted on: Sep 1 2007, 04:42 PM

Replies: 23

BabyShi is so hot and young I wish she had a little sister to play with

Views: 116

Forum: Discussions · Post Preview: #3336

nn links pics and vids

hilljoe Posted on: Aug 19 2007, 04:04 PM

Replies: 7

thanks for your post some nice vids there but I too am a nepi like davidoo I like them

little babies and toddlers rule thank you

Views: 76

Forum: Links to other good stuff · Post Preview: #3198

Some Links

hillioe Posted on: Aug 16 2007, 07:46 PM

Replies: 2

looks like vthe cyber rats put an end to some of them thank you

Views: 41

Forum: Links to other good stuff · Post Preview: #3154

Everyone on vacation?

hilljoe Posted on: Aug 9 2007, 08:25 PM

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Search Results

http://localhost/ipbfree_test/index.php?s=2b817066199051d8a65b54512...

Replies: 5 Views: 32

yes wait till the snow flies and the beaches close and they will come home

Forum: Discussions · Post Preview: #2988

My experiences with kids

<u>hilljoe</u> Posted on: Jul 24 2007, 01:10 AM

Replies: 5

yes please do tell

Views: 70

Forum: Experiences real and imagined · Post Preview: #2603

Baby Boys II(NEPI INSIDE)

hilljoe Posted on: Jul 22 2007, 03:52 PM

Replies: 10

great show I would fuck them boy or girl

Views: 58

Forum: General Info · Post Preview: #2567

incest?

hilljoe Posted on: Jul 13 2007, 09:54 PM

If it were not for all the perverted daddys, uncles and mommys what whould we look at. Replies: 5

So how do you feal about the question? Views: 37

Forum: Discussions · Post Preview: #2259

"getting sex with underage girl" youtube video

Posted on: Jun 28 2007, 07:32 PM <u>hilljoe</u>

Replies: 6

she needs a stiff cock

Views: 56

Forum: Discussions Post Preview: #1849

fetish -turn on

Posted on: Jun 27 2007, 09:12 PM <u>hilljoe</u>

OK what fetish do you have? I like all kinds of perverted shit what gets you hard

I like 1. piss

2. shit

Replies: 9 3.babbies Views: 67

and other stuff go on we are all perverted here say what you like it dose not mean you whould ever do it I have chated with guys who like there girls and boys cold so what if

thats what you like its ok with me

Search Results

http://localhost/ipbfree_test/index.php?s=2b817066199051d8a65b54512...

so what makes you hard?

Forum: Discussions · Post Preview: #1820

use and abuse

hilljoe Posted on: Jun 23 2007, 02:17 PM

I to have had fantasy's about raping a little girl/boy especially a toddler and would like

to see pics and yids not that I would do it. I would not .It is a turn on

Replies: 11 for me. I even read stories on the old (now gone) logical reality site about it and

Views: 101 necro-pedo how do you feel about that doing it to a cold one and would that be going to

far.

Forum: Discussions · Post Preview: #1700

Slave

Replies: 4

Views: 40

hilljoe Posted on: Jun 19 2007, 08:46 PM

Whould you be a slave to a kid be his/her bitch? Boy? girl? Its a fanasty of mine they

could piss and shit on me, in my mouth, and every thing a good whipping to.

Or would you like to have one as a slave? Hope I am not being to bold for a new

member I am just a pervert

Forum: Discussions · Post Preview: #1629

deleted three members for no posts

hillioe Posted on: Jun 19 2007, 08:28 PM

Replies: 5 just joined and have the matter well in hand Views: 36

Forum: General intro to board · Post Preview: #1627

hello pedos

hilljoe Posted on: Jun 19 2007, 01:49 AM

Replies: 3 Hi I see alot of old friends here I am hilljoe many of you know me as joe hill

Views: 36 glad to be here

Forum: General intro to board Post Preview: #1607

Pages: (6) « First ... 4 5 [6]

Open Topic (new replies)

Den Topic (no new replies)

Hot Topic (new replies)

Hot Topic (no new replies)

Poll (new votes)

Poll (no new votes)

Locked Topic

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Search Results

http://localhost/ipbfree_test/index.php?s=2b817066199051d8a65b54512...

Views: 39

Forum: General Info · Post Preview: #4328

MELLO EVERYONE

hilljoe Posted on: Nov 17 2007, 01:34 PM

Replies: 10

hello mayan welcome

Views: 105

Forum: General Info · Post Preview: #4254

re proposed new member

hilljoe Posted on: Nov 11 2007, 03:04 PM

Replies: 5

I vote yes need new blood

Views: 50

Forum: General Info · Post Preview: #4184

Tink is back

hilljoe Posted on: Oct 24 2007, 08:54 PM

Replies: 6 Views: 33 now that vacs are over and the kiddys are back in school i hope every one comes home

we miss you alll

Forum: General Info · Post Preview: #3968

who is cummy (cummy@pookmail.com)

hilljoe Posted on: Sep 27 2007, 01:16 AM

Replies: 8 Views: 66

Replies: 4

Views: 47

well i get around to never herd of him or seen any postings by him on boards, forums or

pic joints

Forum: General intro to board - Post Preview: #3766

Poll: cum "styles"

hilljoe Posted on: Sep 22 2007, 12:13 PM

at 51 I am atill hard all the dam time a

at 51 I am still hard all the dam time every time love to walk throu the stores with a hard on looking at the little ones and going home and go on line to find some thing to wank to

sometimes i shoot some times a run

Forum: <u>Discussions</u> · Post Preview: #3667

Lora's First Cock

hilljoe Posted on: Sep 20 2007, 07:34 PM

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Search Results

http://localhost/ipbfree_test/index.php?s=2b817066199051d8a65b54512...

Replies: 14 Views: 102 wanker unite love to se the little ones being abused

Forum

Forum: H/C pics · Post Preview: #5367

Little asian plaything...

hillige Posted on: Jan 27 2008, 03:08 PM

Replies: 4

Thanks test great work and jas rip them open and make them bleed

Views: 37

Forum: H/C pics · Post Preview: #5366

its so nice to see you all are haing alot of fun

hilljoe Posted on: Jan 27 2008, 03:06 PM

Replies: 4

Us nepis love this thanks

Views: 35

Forum: H/C pics · Post Preview: #5365

now for some of my good ones

hillige Posted on: Jan 27 2008, 03:05 PM

QUOTE (jaslovesfootball @ Jan 27 2008, 07:33 AM)

Replies: 22

the differnce is that i would love to listen to them all cry and beg

Views: 128

God I love this its so hot to see them in pain makes me hard

Forum: H/C pics · Post Preview: #5364

asian girl tied up

hilljoe Posted on: Jan 26 2008, 05:59 PM

Replies: 10 Views: 68 vary hot thank you just right to fuck

Forum: H/C pics · Post Preview: #5331

some favs of mine

hilljoe Posted on: Jan 26 2008, 05:55 PM

Replies: 8 nice test thanks Views: 63

Forum: S/C pics · Post Preview: #5330

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Search Results

http://localhost/ipbfree_test/index.php?s=2b817066199051d8a65b54512...

School-Model - Yasmin

hilljoe Posted on: Jan 26 2008, 05:51 PM

Replies: 8 Go on test rub it in why we inthe cold climents are frezzing our asses off you can be

Views: 56 looking aft half naked girls

Forum: S/C pics · Post Preview: #5329

Beam2 alternate link to Quest

hillioe Posted on: Jan 26 2008, 05:48 PM

Replies: 3 With all the boards being shut down good idea

Views: 37

Forum: General Info · Post Preview: #5328

Wish I had more of this

Views: 42

hilljoe Posted on: Jan 24 2008, 09:07 PM

Replies: 6 She is a hot fuck love to realy fuck her hard

Forum: Nepi · Post Preview: #5259

trying an exiperiment with pic posting

hilljoe Posted on: Jan 24 2008, 09:05 PM

Replies: 4 nice hussy but watch the hot links

Views: 41

Poll: which one would you like to be sucked by?

hillioe Posted on: Jan 20 2008, 04:46 PM

Replies: 5 One or younger about 6 mounths old feeding her daddys milk and eating her pussy (or

Views: 81 his boy pussy or sucking on his baby cock)

Forum: <u>Discussions</u> · Post Preview: #5163

Forum: H/C pics · Post Preview: #5258

Poll: What is your ideal jack off session?

hilljoe Posted on: Jan 20 2008, 04:43 PM

Replies: 4 hard soft hard soft starting and stoping making my lust last

Forum: Discussions · Post Preview: #5162

Views: 44

Search Results

http://localhost/ipbfree_test/index.php?s=2b817066199051d8a65b54512.

Replies: 1

Where are all the girl love boards gone to like kitty love?

Views: 18

Forum: Discussions · Post Preview: #6526

Valya

hilljoe Posted on: Nov 18 2008, 01:17 AM

Replies: 3

seen before a great vid

Views: 46

Forum: Videos · Post Preview: #6525

8yo blowjob

Posted on: Nov 18 2008, 01:16 AM hilljoe-

Replies: 5

Not her frist time a pro at it thanks

Views: 50

Forum: Videos · Post Preview: #6524

Blowjob

Posted on: Oct 5 2008, 02:35 AM <u>hilljoe</u>

Replies: 2

Great I hope daddy fucks her to

Views: 40

Forum: Videos · Post Preview: #6466

To Take Us to 2600...;0)

Posted on: Oct 5 2008, 02:02 AM hilljoe

Replies: 7

little whores need to be raped hard thanks

Views: 43

Forum: H/C pics · Post Preview: #6465

Here's some yummy ones!

Posted on: Aug 21 2008, 09:37 PM hilljoe

Replies: 24

Great never to young to be raped

Views: 82

Forum: H/C pics · Post Preview: #6399

My Public Service Announcement

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Child Identification Report

The following does not constitute verification of the identity of the child. It is the responsibility of the investigator/prosecutor to contact the listed law enforcement agency for verification of image and age verification of the child.

TA Report #:

46559

of Image Files Identified: # of Video Files Identified: 106 0

Total# of Series Identified:

46

Aaron
Amy&Bro
Blue Shirt Girl
Cait
Daphne
Gerber
Helen
Jacob&K@tie

Laura-UK

Tara

Privat Shots

Wild Rider

Abby
Andina
BluePillow
Camille
Devon
Glenn
Hitradio
Jan_Feb
Leaf

RCA

Trever

pt-emma

Ali
Baby Hee
Brad&Bry
Caution
ET
Goldi
IM
Jennette
Menz
ST_
Vicki

Amanda
Bianca
Bri_having
Dalmations
Felisha
Hantzel
Inna
Jenny
Morgan
Sierra-Model
Vicky

To whom it may concerns

I apologize for not being there today my work in California has kept me there longer than I expected, but I wanted my voice to be heard all the way across this country. I can't begin to tell you how this situation effected myself and my family, there are so many effected, truth, responsibility and justice are words thrown around every home and school around this country, what do they really mean. How do you tell a child whose been manipulated, terrorized and victimized that everything would be ok, how do you tell that same child, tell the truth and justice will avail and the person responsible will pay for there action, when the person is still manipulating and victimizing from jail using court system. As the law has it set Mr. Martin has more rights than my children, I find this really troubling. I could not believe what I was hearing when the district attorney called to tell me Marlin had wanted to take the plea agreement that had stood from day one day two there should have been no deal on the table anymore, for my self hearing 50 years was like a slap on the face as to everything I have taught to my children since they were young. With truth justice will prevail I don't think any of us think 50 years as justice. Regardless of the demise of these monsters in this case. With a 50 years sontence, the thought in Mr. Martin's head must be someday I could still got out. The authorities should not have allowed that thought to have entered his head.

I know with time, counseling and the love of their families all the people affected by this will move on with their lives — Mr. Martin has not won. I pray that anyone investigating, prosecuting, or judging this case never has to hear from a child close to him or her, that someone has sexually assaulted him or her. It leaves a knot in your stomach and a hole in your heart that can never he fixed, anyone who says they understand how you feel, and has never had a child close to them sexually assaulted, can't even imagine until it happens to you, you have no idea. I don't know if a thousand years would make me feel like justice has been served. But for the crimes that Mr. Martin has committed 50 years seems like a slap on the wrist. Mr. Martin has hasn't just taken the hope and dreams of 12 children and how many more that have not come forward. He has taken the hopes and dreams of our future and for that no amount of time could be justice enough.

All I can hope is Mr. Martin gets his justice in prison. I thank the court for the time at least to be heard and I hope the court decides 50 years is not enough and sentences Mr. Martin to a harsher, tougher sentence that sends a





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message to all offenders like him that they cannot get away with this kind of behavior.

VICTIM IN THE YICKY SERIES

To Whom It May Concern:

My name is I am 19 years old and am living everyday with the horrible knowledge that someone somewhere is watching the most terrifying moments of my life and taking grotesque pleasure in them. I am a victim of the worst kind of exploitation: child porn. Unlike other forms of exploitation, this one is never ending. Everyday people are trading and sharing videos of me as a little girl being raped in the most sadistic ways. They don't know me, but they have seen every part of me. They are being entertained by my shame and pain.

I had no idea the Vicky series, the child porn series taken of me, had been circulated at all until I was 17. My world came crashing down that day, and now, two years later, not much has changed. These past years have only showed me the enormity of the circulation of these images and added to my grief and pain. This knowledge has given me a paranoia. I wonder if the people I know have seen these images. I wonder if the men I pass in the grocery store have seen them. Because the most intimate parts of me are being viewed by thousands of strangers and traded around, I feel out of control. They are trading my trauma around like treats at a party, but it is far from innocent. It feels like I am being raped by each and every one of them. What are they doing when they watch those videos anyway? They are gaining sexual gratification from images of me at ages 10 and 11. It sickens me to the core and terrifies me. Just thinking about it now, I feel myself stiffen and I want to cry. So many nights I have cried myself to sleep thinking of a stranger somewhere staring at their computer with images of a naked me on the screen. I have nightmares about it.

My paranoia is not without just cause, Some of these perverts have tried to contact mo. One tried to find me through my friends on Myspace. Another created a slideshow of me on YouTube. I wish I could one day feel completely safe, but as long as these images are out there, I never will. Every time they are downloaded I am exploited again, my privacy is breached, and my life feels less and less safe. I will never be able to have central over who sees me raped as a child. It's all out there for the world to see and it can never be removed from the internet. I only ask that those who have exploited me be brought to justice to hopefully defer some others from doing the same and to lessen my shame.



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Dear Judge:

I am the identified subject in what is known as the "Vicky" series of images. I am writing to you to let you know that for each one of the defendants you see, the fact that he has downloaded the images of what has happened to me hurts me very much.

I now suffer from flashbacks and panic attacks. I have trouble sleeping. I can't be in a group or crowd of people for more than 40 minutes or so at a time before feeling like I have to leave. Because of this I have had to leave college as I could not participate in my classes because of my panic attacks. I have this overwhelming undefined fear that sweeps over me. This is for the biggest part because of the men who are downloading the pictures and videos of me. My father, who did the abuse, is now locked up and I have some peace in knowing that he can never hurt me again or hurt anyone else. I don't know that about any of these other men. For each of them, it is true that I don't know him; I don't even know what he looks like. And, it may seem strange, but the not knowing is a big part of what causes me such problems. What is so frightening is that I could have walked past him any day on the street and not know that he would have had seen me being raped as a little girl, and enjoyed my pain and humiliation. Any one of them could be around me and I would not even know it,

The fact that the defendant you are sentencing has seen the pictures of me makes a difference. I believe you have the Victim Impact Statement that I wrote previously. All of the things that I stated there are true about each one of them. I learn about each because of the Victim Notices. I have a right to know who has the pictures of me. The Notice puts name on the fear that I already had and also adds to it. When I learn about one defendant having downloaded the pictures of me, it adds to my paranola, it makes me feel again like I was being abused by another man who had been leering at pictures of my naked body being tortured, it gives me chills to think about. I live In fear that any of them, may try to find me and contact me and do something to me. I have been contacted by some of them and some have said

terrible things to me. The fact that each one is out there and has seen me and watched me being raped makes me sicker, makes me feel less safe, makes me feel more ashamed and more humiliated.

I hope you can understand how devastating this is to me and how this has added to my stress and troubles. Thank you for considering my letter. I truly want to and hope to get well and live as close to a normal life as I can. I ask that each one do something to help make up for the harm that he has caused me by helping me pay for the counseling I need.

Sincerely,

KNF --- "Vicky"

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VERIFICATION

STATE OF WASHINGTON

) 85. }

i, the continue of the court for its use in sentencing proceedings in cases which involve my images.



SUBSCRIBED AND SWORN TO before me this (2 day of June 2010.

PRINTEDITYPED NAME CARELL L. HEPBA

NOTARY PUBLIC In and for the State of Washington, residing at Sea 47 c UA My Commission Expires (1-6-13

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Victim's Impact Statement - Mother of Victim Vicky Series

October 1, 2010

Your Honor and ladies and gentlemen of the court:

My daughter was raped and sexually abused in so many horrible ways, as a child, by her biological father. He also videotaped her abuse, as he ravaged, raped, and pillaged her 10 year old body. This sick man shared these repulsive pictures and videos of her on the internet for perverts like himself, to see. The sexual abuse she suffered at the hands of her father, without a doubt, started her agonizing pain, <u>but this is certainly not where her pain ends, or mine. Yes, the memories and trauma of her abuse still</u> haunt her, and our family, but, now, there is a new abuser. The new abusers are the sick individuals who down load her pictures, and enjoy watching her being sexually assaulted as a child. This sickens me! Every time these pictures of my daughter are looked at and passed around, the depraved people doing this are furthering my daughter's pain, shame and abuse. They pass it around like some dirty magazine, when in fact it's the footage of an abused, helpless child. There are days when the pain from this is unbearable for me. These vile people increase her pain, and mine. These are certainly not the hopes and dreams I had for my little girl; this life of pain and shame. It is so terribly sad and painful, to watch her struggle with this. These awful people are raping my little girl all over again, by cruelly enjoying her pain and deriving some sick sexual pleasure out of it. The knowledge of this sends me into mourning; mourning the loss of my child's dignity and well being, and mourning the fact that she suffers such deep pain. I have watched her suffer so much already and it kills me. I have to watch her suffer still, at the hands of people wanting to view the nightmare of her abuse, as her innocence was being robbed. She was a child and helpless, and made to do disgusting things she did not want to do: Approval from her blological father came only when she carried out his every dirty command. He posed her, insisted she say certain things, and made her force a smile as he was brutalizing her. When I think of my daughter being groomed and posed and make to feel so dirty in these perverted, and depraved pictures, and videos, it hurts me to the core. I wonder how there can be people that could actually enjoy watching my little girl getting raped, and sexually abused. I wish they knew how much it hurts, and how much they are worsening our pain. Knowing that these disturbing videos of her and her abuser are being viewed, and are continuing to foster this corrupt sexual behavior, bring a lot of pain, stress and shame to her. At the cost of here dignity, modesty, and innocence, people viewing those images of her, are furthering the terrible addiction of child pornography for themselves and others they pass it on to. Those images are not who my daughter is, or ever wanted to be, but because she was robbed of her innocence, forced to do ugly things, and it was videotaped, she is continually being viewed as someone she is not. She is in fact the opposite. These offenders are still victimizing and torturing her, bringing pain and shame every time they look at those images of her. As her mother, I share in this heartbreaking pain and the sadness this brings to me is unending. These viewers need to understand that there is a helpless little girl on the other side of these videos, whose innocence and childhood were shattered and viewing these things make them a part of the abuse, and unimaginable pain my daughter, and our family have to face all the time. Making viewing, and downloading child pornography is wrong and a crime. I hope everyone can know that child pornography is not a victimless crime by the statement I've shared with you about my daughter, and our family's constant pain and struggle.

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Victim's Impact Statement - Mother of Victim Vicky Series

October 1, 2010

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Update 10/01/2010

Now as a young adult, my daughter's life is still very hard and she still struggles so much, due to her sexual abuse and it being constantly viewed. I also struggle. It is so devastating to know your child's life has been brutalized, and to make matters worse, it has been released to the public for any deviant, at the press of a button, to view and continue this sickening process of enjoying my daughter's pain.

Although, she is making progress and growing stronger, this still has a major grip on her life, as it also does on mine. She has never had a boyfriend, due to trust issues and fear of relationships. She does very well in college and is trying to open herself up more to her friends, and fellow students. This is going to be a continuing process. She feels like she is marked with a scarlet letter because of her victimization and rape, marking her with shame. The pomographic images of her are out there continually being viewed, and will continue to be forever.

If I could quote my daughter in something she often says in describing how she feels about these people downloading her images....If you can imagine having a bad picture of yourself taken, one that you're really embarrassed aboutnow picture yourself naked, being raped and abused and hurt at the age of nine or ten....your pictures of abuse at the hands of someone else are now being viewed for anyone to see at the touch of a button on a computer.....these viewers are even interacting with your images of abuse. That is how she feels everyday.....wondering who is going to see her next.

As I write this impact statement I find myself drained because of the emotional strain and pain that comes from reliving this horrible ongoing crime that terribly affects me and my family. It's a huge sorrow every day of my life, and my daughter's life, knowing her images of abuse are being traded, viewed, and inter acted with, by sick people using her nine year old body as a sexual thrili. To know these perverted people want to partake in, and are excited about the horror of your child's little body being raped over and over again makes me sick! These viewers know she is a child. They can very clearly see that. It makes no difference to them. They're the reason my daughter and our family have to keep reliving this horror of her abuse because they keep it going. They keep viewing it and passing it on to others. She didn't have a choice....they do!! Their choice is traumatizing my daughter and exploiting the broken pieces of her life. These viewers made the choice to descend to the lowest degree and rape her with their eyes, and with their minds, as she was being robbed of her innocence at 9 years old. I feel robbed every time I get notified of another case involving my daughter's images. I feel like some part of her is being taken and used and abused every time I hear of another perpetrator. Can you imagine how hard it is for her to regain her self esteem, dignity, and well being? It confuses me that some people in powerful positions can believe this is a victimless crime....not only is our daughter a victim, but our family is also.

As her mother, the sadness of what has happened to her and what is still happening to her is unending. They say time is a healer of all wounds, but I have yet to feel this pain sub side.

Child pornography is a crime and those viewing it are committing a crime that always hurt the child or children who are involved. It is destructive in every way to the viewer as well. This crime needs to have severe consequences because of the devastating pain, fear, and shame it causes children. This pain

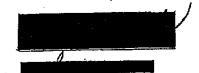
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Victim's Impact Statement - Mother of Victim Vicky Series

October 1, 2010

does not end for the child or their families, but continues on for the rest of their lives. I wish I could take away my daughter's pain and give her back what has been stolen from her. I cannot, but I am asking for accountability from the individuals who have hurt her and are continuing to hurt her. For my daughter and countless others who are victims of such a terrible and painful crime; please grant us justice today!

Sincerely,



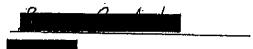
Case 2:09-cr-01004-MMM Document 163 Filed 02/28/11 Page 41 of 57 Page ID #:1244

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STATE OF WASHINGTON COUNTY OF

, being first duly swom on oath hereby certify and affirm that the victim impact statement i have given is true and accurate to the best of my knowledge and belief. I submit the statement to the court for its use in sentencing proceedings in cases which involve the images of my daughter.



SUBSCRIBED AND SWORN TO before me this 16 day of October 2010.

NOTARY PUBLIC in and for the State of Washington, residing at

My Commission Expires

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Case 2:09-cr-01004-MMM Document 152-1 Filed 12/15/10 Page 24 of 39 Page ID #:1020

Victim's Impact Statement - Step-Father of Victim Vicky Series

October 1, 2010

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To whom it may concern,

My family has endured five years, to date, of a living hell because of the selfish, perverted actions of a very sick and evil individual. My daughter lived with this pain and trauma for six years prior, unable to tell anyone because of the fear she had for her biological father. We thought we were dealing with one "bad apple", but as time goes by we are finding that there are more and more of these sick individuals that are viewing, and sickly satisfying their awful desires.

We still have the haunting memories of the letters in the mail, and emails letting us know of all the individuals that are being prosecuted because they have our daughter's images, child pornographic images, on their computer. We don't' receive the notices anymore, the pain and gut wrenching reminder of receiving enough notices to over flow a 55 gailon drum is more than my family can take. It's also unfathomable to know there are so many perverts in this country and around the world. It sickens me and hurts me to the core knowing that so many perverts are viewing my little daughter as she was made to dress up like a hooker, and is molested and raped time and time again. I am heartbroken knowing that I couldn't protect my daughter. The letters and emails brought that pain up again and again and I couldn't deal with that, knowing her innocence has been torn away and now how she is continually reminded that her pictures will be there forever! This father's heart is broken.

My daughter carries her shame like a scarlet letter. She knows that if a friend or acquaintance looks her up on the internet they are going to find the ugly, horrible, awful history that eats away at her self-esteem and paralyzes or inhibits her ability to function at school and as a normal young adult. She knows that this is the challenge that she has to live with, but the horrible trauma continues to take its toll on her body and soul. The constant reminder that her pictures are out there brings forward the guilt and shame, which cause nightmares and makes her want to isolate herself from others. Each time she hears about these cases she looks so strong on the outside, but when you sit and talk with her you see the pain, you hear the struggles and feel the sadness, despair and the emotional drain that it causes.

My family is asking for Justice with each case that is brought forward with these perverted individuals. We are hoping and praying that they can understand how wrong they are and how hurtful their actions are for each victim in the pictures and videos on their computers. We want them to know that they have a choice to decide to view the images, or not, and because they have chosen to view these child pornographic images they are victimizing each child viewed... bring back the pain and suffering these children have already had to endure. Our Justice System needs to protect these children from the preying eyes and hands of these perverts, because they can't fight back, or don't know how to. Our Justice System needs to understand that there is a victim in each of these images, and each time a picture is downloaded these children are victimized again and again. Please help these perverted individuals understand the significance of what they are doing and how each child is a victim because each child has done nothing wrong.

My daughter is the strongest person that I know and I am so proud of her. It is extremely sad to see how this horrible situation continues to beat her down emotionally and physically. She still has trouble sleeping due to nightmares of the horrible trauma she went through, and also of new people finding out

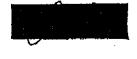
Victim's Impact Statement - Step-Father of Victim Vicky Series

October 1, 2010

who she is, or unknown people finding her and abusing her. She also has severe stomach aches and headaches that incapacitate her, causing her to miss school and work. I pray that she can heal from the trauma that her biological father did to her and from the constant reminders that each of these sick individuals bring with each download. I also pray for the rest of my family. The crimes against my daughter have had untold effects on our other children, my wife and myself. This "living hell" that I first mentioned is a day-to-day ordeal that can raise its ugly head at the most in-opportune times. Like my daughter, we are sometimes paralyzed by the trauma that comes from being the parents of a sexually abused child. The sad fact is this doesn't end, because my daughter's images will be out on the internet forever, continually reminding her and us of how fragile we all are. The internet is such a powerful tool, but child pornography, and how it perpetuates the re-victimization of children is an extreme consequence to our society as a whole, but specifically to our vulnerable children.

Our society views our children as precious little gifts that we should love and protect. Some sick, perverted individuals use the internet as their evil play ground to share and use in their sick, fantasy world. They choose to do this. They choose to push the buttons. They make a decision to download and view. Actions sometimes have consequences, and when actions like this happen the consequences should be powerful and lasting. Give my daughter her justice, so that she may completely heal some day.

Respectfully,



Filed 12/15/10 Page 26 of 39 Page ID #:1022 Case 2:09-cr-01004-MMM Document 152-1 VERIFICATION STATE OF WASHINGTON 58. COUNTY OF Leing first duly sworn on oath hereby certify and affirm that the victim impact statement I have given is true and accurate to the best of my knowledge and belief. I submit the statement to the court for its use in sentencing proceedings in cases which involve the images of my step-daughter. SUBSCRIBED AND SWORN TO before me this the day of October 2010. NOTARY PUBLIC in and for he State of Washington, residing at

y Commission Expires

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Court Docket #09-CR-00075

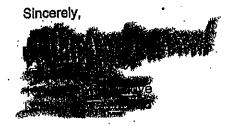
To: US District Court

On behalf of the victim, my daughter, I would like submit a statement. This child has been a bright light to me, other family members and the community. She is a very smart, determined child excelling in just about everything she involves herself (school, art, cheer, tennis) and a most obedient child always wanting to please others.

The production of these videos/pictures was abhorrent and I feel that she has suffered immensely over this but anyone who views these pictures and/or videos should be held just as accountable because he or she is exploiting an innocent child. These people have no concern for the trauma they are causing this young child now and in the future. Her life has changed and may never be the same she has been uprooted from her elementary school to another one (to protect her from malicious comments) and possibly to a new school system next year, she cannot just go around unescorted for our fear that someone else may know the situation and prey on her and she cannot live in the house she grew up in because people have been watching the house, blogging about the situation. She is in weekly counseling and has begun to have night terrors sometimes 2 – 3 times a week. Her rights as a human being have been totally violated and I do not know how this will affect her in the long run physically and/or emotionally.

Anyone viewing these videos/pictures is just as guilty for causing this child undue harm, unneeded stress and insecurity in a time when she needs to feel safe to recover. She is too young and not quite mature enough to realize the extent of people looking at these and the impact that it will have on her recovery and through her life. She knows that there are people viewing these and she wants to know where they are from when we get notifications because she has a fear that they will know her if they live near us. These people need to be punished for taking away a major part of her childhood.

I could go on but I offer these reasons the defendant should not be allowed around children for a long time.



To: Whom this may concern,

has happened to me has

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Victim Impact Statement for the School-Aged Child

What is your name? 15 What grade are you in How old are you?

Please explain briefly what led to you originally being victimized or assaulted. You can continue on another piece of paper, if necessary, to answer this or any other question.



Explain how your life has been affected by having images of your victimization viewed and downloaded by others from the internet and from knowing this is likely to continue occurring.

I makes me feel in bemparressed

I I down't like people haveing ine on the internet.

What sentence would you like a judge to order for someone caught sending, receiving or possessing sexually explicit pictures of you?

30 year in Jail



Case 2:09-cr-01004-MMM Document 163 Filed 02/28/11 Page 48 of 57 Page ID #:1251 Case 2:09-cr-01004-MMM Document 152-1 Filed 12/15/10 Page 30 of 39 Page ID #:1026

Describe any psychological or emotional long term effects that have occurred, and/or you expect will continue to occur, as a result of the defendant sending, receiving or possessing sexually explicit pictures of you.

Is there anything else you would like the judge to know about how you feel because of what has happened to you?

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Victim Impact Statement for the School-Aged Child-

What is your name? What grade are you in?

Please explain briefly what led to you originally being victimized or assaulted. You can continue on another piece of paper, if necessary, to answer this or any other question.

The next him at the fair and

The next yea we net through
a friend. hanguout at his house.

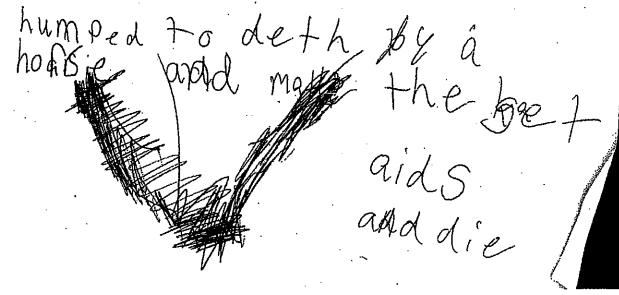
he told the other lids to get

Explain how your life has been affected by having images of your victimization viewed and downloaded by others from the internet and from knowing this is likely to continue occurring.

makes me foral embaréssed

don't really tell any body
don't hille to taill to Police

What sentence would you like a judge to order for someone caught sending, receiving or possessing sexually explicit pictures of you?



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Describe any psychological or emotional long term effects that have occurred, and/or you expect will continue to occur, as a result of the defendant sending, receiving or possessing sexually explicit pictures of you.

Is there anything else you would like the judge to know about how you feel because of what has happened to you?

that they all should get hump by a horse and get aids and get Stort and all the other in the world Case 2:09-cr-01004-MMM Document 163 Filed 02/28/11 Page 51 of 57 Page 1D #:1254

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Victim Impact Statement

When you bring children into this world you are their soul protector. As a parent you strive to meet all the needs of your child so that they may blossom into productive and healthy adults. Along the way you put your trust in other people to help in the upbringing of your child. This was the case with me. I had a live in boyfriend. We planned to wed the summer that my home was raided by the ICE. It was also the summer that I found out that he molested my daughter, the summer that my children and I pack everything up and moved to another town, and the summer that our lives changed forever. My daughter and I live in constant fear that others will find out what has happened to her. We are both scarred for life. While I went to work my ex-boyfriend took pictures of my daughter, posted them on the Internet, and molested her. I can't even imagine what was and still is going through my daughter's mind, even after receiving two years of therapy. She will never be able to eraser the memories of the abuse, pain, and suffering that she received. She was tortured by the man that she only wanted to be her daddy. He abused her trust and mine. I will never forgive myself for this. I was the one that was supposed to take care of her and make sure she was safe. I failed my daughter and I will live with that regret for the rest of my years. To make matters worse once the pictures were posted on the internet, they cannot be eliminated from others that have them or where ever he posted them. Even though this pedophile is in jail he is not the only one that is now serving a life sentence.

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To Whom it May Concern:

I am writing this statement as the mother of a child who was used to produce a series of pornographic images that have been identified in this case

I have struggled for quite some time with how to balance seeking justice on my daughter's behalf with protecting her privacy (or what is left of it after the nightmare of the past few years.) I am providing the following statement in the interest of justice, but I also ask the court to Please place under seal any court documents that contain my daughter's name, my name, or any other identifying information (such as the name and relationship to her of the abuser)



Contribution:

From 2002-2003, my daughter was abused repeatedly to produce images for the purpose of being traded/shared over the internet. Without a market to receive and trade those images, without the encouragement of those who wanted to acquire the images, I truly believe this abuse would not have occurred.

All those who trade these images and thereby create the demand—for lurid and violent depictions of children are participants in the exploitation of my daughter. Each traded picture that placed a value on inventiveness, novelty, or cruelty played a role in egging on the abuser to even more vile acts.

The pictures of my daughter were "made for trade" - her abuser adapted to serve his market- whatever his audience was looking to acquire, that's what happened to her. Torture, degradation, pain & suffering — whatever was being traded for and downloaded directly influenced what happened to her — and what is still happening to other children like her.

My daughter was exploited, not only by an individual, but also by an industry that consumes and destroys innocent children.

Producer, distributor, and consumer- everyone who participates in this evil exchange helps creates a market, casting a vote for the next abuse. Regardless or whether they directly abused children themselves, reveled in the images of suffering, or persuaded others to abuse children on their behalf (to provide images of the abuse) each participant has a responsibility for the effects.

Effects:

What are the effects? I've watched my daughter transformed from a buoyant, cheerful child full of energy and enthusiasm, to an anxious and fretful shadow of her former self. And I've then watched the painful struggle as she's worked to overcome the damage done, and build a new life for herself.

She still can't talk about what happened to her-just a whisper now and then with her eyes wide with horror.

During the time these pictures were being made, she had steadily been falling behind in school. And not due to any lack of ability - she tested well above average in intelligence. She seemed to be unable to focus. And no wonder. As her classmates learned to read and spell, school their biggest challenge, she had been living a silent hell, unable to communicate the source of her distress.

Even now, she has so much trouble even talking about what happened, I can't even hope to do justice in words to her suffering. Only a child who has suffered meaningless sadistic torture, for another's idle amusement, could even begin to know.

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Once she was no longer being used to produce those horrible pictures, she began to recover and was able to concentrate on school like other children her age. With many months of tutoring, and constant hard work on my daughter's part, she began finally reading with confidence. Regaining lost ground in math was harder, but she was finally able to do it. She's a tough kid. She's had to be.

Throughout this nightmare, I'd longed to put my arms around my child and comfort her. But her experience left her distrustful of any touch - a hug, a kiss, an arm around the shoulder - all met with disdain and shouts of "no smooshies." For months, the only creature she would hug was the stuffed toy she carried to bed with her.

The little girl who once played at dress up and called for me to come see how beautiful she was, now hates being called pretty. She's learned that being "pretty" attracts the type of attention she dreads. After extensive therapy, she's beginning to recover now: she no longer smears food on her face, or pulls tangled hair over her eyes to hide behind, as she used to. It's less often now that she rubs her hands raw, washing them over and over again, trying to feel "clean". She even comes to mom for hugs now and then.

But the fear is not entirely gone. The strategically placed broken toys on the floor ("to hurt the feet of the bad men if they try to sneak into our house") have been replaced with martial arts lessons, which she practices with a grim determination "to learn how to protect myself". And then there's the shadow that still comes over her face if a stranger gives her an unexpected complement. The pictures are still out there...

My daughter is a courageous and resilient child, and I know that she will continue to find the strength to cope with the losses and suffering she has endured. But I also know that this will always be with her, a cross she has to bear in her life. As she grows up, looks for companionship, marries, when she holds own children in their arms- the fear and doubt brought on by this living nightmare can never be entirely erased.

Forever

My daughter understands that some police and social workers have seen "the pictures". The account of how she was saved - how the policemen on the internet saw that a little girl was being hurt, and wouldn't stop looking for her until she was found and rescued-she likes hearing that. But now that she's growing older and realizing the extent of the internet, she's also beginning to grasp the darker side of the story - how many people saw those same pictures as something to enjoy rather than abhor.

We have no way of knowing how many pedophiles used the pictures of her being tortured and degraded as an opportunity for personal gratification. Someday, the full realization will surely strike her. I dread the day when her anxious question "have they seen the pictures?" becomes a daily trial for her with every new face, as I know it already is for me.

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I struggle with anger at the unbounded nature of this continuing exploitation and the arrogant callousness of those who perpetuate it.

If I had my way, each and every image of my daughter's sufferings would be burned. Then she would no longer have to worry about those images being used to further hurt or humiliate her. But as it is, there are those who have no shred of decency, and continue to copy and pass on these pictures. Each person who callously passes on those sickening pictures is exposing my daughter to further shame and humiliation. As long-as this continues, the pictures will always be out there.

My child dreams of accomplishing great things in her life. She sees herself one day becoming a famous movie star, or president, or both. Whenever I think about this, I am overcome with fury at those who keep these pictures alive, always waiting to be exploited in the future by the unscrupulous to cause further pain.

A mother's fear

Every parent knows that there are individuals out there they desperately want to keep their children away from - the sadistic predators, the merciless fiends that would prey on young lives. Each horrible, tragic tale that appears in the paper brings the silent prayer-"not my child! Please, not my child!" My daughter has already suffered so much - it seems an outrage that anyone would put her at further risk.

But then there's the cold reality - who bothers to risk prison to acquire pictures of a child being tortured and abused? Exactly the type of fiend that a parent fears! Surely the people who pass on these pictures know they're exposing the children in them to the risk of being further victimized! But it must not matter to them.

The more widely distributed these pictures become- the larger the audience- the greater the chance that they will fall into the hands of someone who feels that just looking at the suffering is not enough. Who wants to follow up with a more personal relationship. I do not want my daughter advertised to these fiends as a victim! I don't want her to have to worry when she sees a flash of recognition in a stranger's eye that they may recognize her not as a person, but as an object for abuse!

Not alone

"What about the other kids?" my daughter asks me. She knows she was not alone in being exploited – her abuser used her image to trade for thousands of others. There's no answer I can give her on why her prayers for rescue were answered, when so many others have not been.

For more than a year, she suffered humiliation and torture while her pictures were being traded and her abuser practiced "improving" the product he was providing. Any one of the folks who acquired her picture could have reacted in a decent, human matter and contacted the police to let them know a helpless child was being tortured.

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But they didn't — not one of them. She was only rescued when the police finally found her picture in an arrest. Everyone who downloaded or traded for those pictures, enjoyed their entertainment, and never thought to help-just prolonged her suffering.

And those other kids? The ones she still worries about? Who's moms aren't writing statements now because they don't know what's being done- because their children are still being used to produce entertainment for those who never stop to think of them as real human-beings?—Their suffering continues...

Worse yet are those who have been disposed of entirely (as my children and I would have been had the police not found my daughter's abuser first. I learned first hand the extremes to which those who exploit children will go when her abuser confessed to having hired men to kill us to get rid of us). Thank God my daughter was rescued! But the silent images of the unrescued children should shout just as loudly the real horror of this crime.

Responsibility

I can find no words to express the fury I feel at those who participate in this evil, or my scorn for any attempt to minimize the responsibility by feeble claims that the crime was "victim-less". My daughter is a real person. She was horribly victimized to provide this source of "entertainment" She is exploited anew each and every time an image of her suffering is copied, traded or sold. While the crime is clearly conscienceless, it is hardly "victim-less".

I asked my daughter what she most wanted to ask of the judge. Her request: "Please, don't let them pretend no-one's getting hurt!"

She had some words for the defendant as well: "don't you know no one should do that to a little girl! Don't you know it hurts!"

As the mother of a child victimized by this crime, I would ask that the court take into consideration the damage done by this heartless crime to my daughter and others like her (including those children who still wait for someone to rescue them from their exploitation, and have no-one here today to speak for them) and impose a sentence that takes into account the full impact of the crime on the victims.

CERTIFICATE OF SERVICE

I, LIEN NGO, declare:

That I am a citizen of the United States and resident or employed in Los Angeles County, California; that my business address is the Office of United States Attorney, United States Courthouse, 312 North Spring Street, Los Angeles, California 90012; that I am over the age of eighteen years, and am not a party to the above-entitled action;

That I am employed by the United States Attorney for the Central District of California who is a member of the Bar of the United States District Court for the Central District of California, at whose direction I served a copy of:

GOVERNMENT'S SENTENCING POSITION REGARDING THE SENTENCING OF DEFENDANT PAUL CHALLENDER

service was:

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[XX] Placed in a closed envelope, for collection and interoffice delivery addressed as follows:

- [] Placed in a sealed envelope for collection and mailing via United States Mail, addressed as follows:
- [] By hand delivery addressed as follows:
- [] By facsimile as follows:
- [] By messenger as follows: [] By federal express as follows:

Lori Pascover U.S. Probation Office

This Certificate is executed on February 28, 2011, at Los Angeles, California.

I certify under penalty of perjury that the foregoing is true and correct.

LIEN NGO

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